

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**CARLOS A. GARCIA PEREZ, ET AL**

**Plaintiffs**

**vs.**

**ALVARO SANTAELLA, M.D., ET AL**

**Defendants**

**CIVIL NO. 97-1703 (JAG)**

**JURY TRIAL DEMANDED**

**MOTION REQUESTING LEAVE TO FILE UNDER SEAL  
MOTION REGARDING SATISFACTION OF JUDGMENT**

**TO THE HONORABLE COURT:**

Comes now codefendant, American International Insurance Company of Puerto Rico, Inc., hereinafter AIICO, through the undersigned attorneys and respectfully states and prays as follows:

1. On this same date, AIICO, in it's capacity as the insurer of Ashford Presbyterian Hospital, has filed a motion under seal pursuant to the terms of the Confidential Settlement Agreement executed by the Parties and the Judgment entered by this Honorable Court.
2. Pursuant to the Court's rulings and the Parties agreement regarding the confidentiality of the settlement terms, AIICO respectfully requests leave to file it's Motion in Satisfaction of Judgment under seal.

**WHEREFORE**, it is respectfully requested that the Honorable Court take notice of

this Motion.

**I Hereby Certify** that on July 1, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Andres Guillemard Noble, Esq., Joan S. Peters, Esq., Pedro J. Cordova, Esq., Angel R. De Corral Juliá, Esq., Marta E. Vilá Báez, Esq., Roberto Ruiz Comas, Esq., José Enrique Otero, Esq., José Hector Vivas, Esq., Igor J. Dominguez, Esq., Doris Quiñones Tridas, Esq., Jose González Castañer, Esq., and Pedro Toledo González, Esq.

**Respectfully Submitted** in San Juan, Puerto Rico on this 1<sup>st</sup> of July, 2005.

**S/ JEANNETTE LOPEZ DE VICTORIA**  
**JEANNETTE LÓPEZ DE VICTORIA**  
**BAR NUMBER 205101**

**S/ ISABEL GUILLEN BERMUDEZ**  
**BAR NUMBER 214206**

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